NORLITE CORPORATION

628 SO. SARATOGA STREET
PO BOX 684
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PHONE: (518) 235-0401
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July 2, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 06/05/12- 06/27/12
Kiln 2: 06/05/12- 06/27/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 06/05/12 thru 06/27/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The bulk of the cutoffs were associated with one block of time on 06/22/12 for Kiln 2. Kiln 1 was having difficulty maintaining the minimum LGF line pressure. The Supervisor increased the LGF Line pressure by restricting the return line flow to increase pressure. The increased pressure made fuel flow control difficult for Kiln 2 which caused fuel flow surges. The fuel flow surges resulted in pressure spikes which affected the Rear Chamber System. Further investigation revealed a secondary valve was partially closed which affected the LGF line pressure for Kiln 1. Once the secondary valve was opened, Kiln 1 was able to maintain the minimum LGF Line pressure. Norlite and its consultant will continue to evaluate each cutoff in order to reduce the overall number of cutoffs.

DCL: 2410

Norlite Corporation

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments

DCL: 2410

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
06/05/12 - 06/27/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
6/8/2012	17:46:54	6/8/2012	17:49:44	0:02:50	96	Malfunction	End of Burn Tank Reached Which Caused the LGF Pump To Surge Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow and LGF Line Pressure
6/9/2012	21:15:12	6/9/2012	21:18:23	0:03:11	97	Malfunction	pH Probe Faulted Due to A Loose Wire Which Caused the Instantatneous Upper Instrument Setpoint To Be Reached for Scrubber pH Span	Scrubber pH	Span	I & E Repaired Wire
6/9/2012	21:19:45	6/9/2012	21:26:57	0:07:12	98	Malfunction	pH Probe Faulted Due to A Loose Wire Which Caused the Instantatneous Upper Instrument Setpoint To Be Reached for Scrubber pH Span	Scrubber pH	Span	I & E Repaired Wire
6/9/2012	21:28:23	6/9/2012	21:30:15	0:01:52	99	Malfunction	pH Probe Faulted Due to A Loose Wire Which Caused the Instantatneous Upper Instrument Setpoint To Be Reached for Scrubber pH Span	Scrubber pH	Span	I & E Repaired Wire
6/10/2012	8:39:58	6/10/2012	8:40:43	0:00:45	100	Malfunction	Stack Gas Probe Was Dirty Which Caused the Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	I&E Cleaned Probe
6/12/2012	12:51:21	6/12/2012	12:53:05	0:01:44	101	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
06/05/12 - 06/27/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
6/17/2012	6:38:13	6/17/2012	6:38:39	0:00:26	266	Malfunction	High LGF Line Pressure Made Flow Control Difficult, Minor Adjustments Resulted In Significant Flow Changes Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Lowered LGF Line Pressure and Adjusted Fuel Flow
6/17/2012	6:38:45	6/17/2012	6:39:08	0:00:23	267	Malfunction	High LGF Line Pressure Made Flow Control Difficult, Minor Adjustments Resulted In Significant Flow Changes Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Lowered LGF Line Pressure and Adjusted Fuel Flow
6/22/2012	2:02:10	6/22/2012	2:03:56	0:01:46	268	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line which Caused LGF Flow Control Problems on Kiln 2 Which Caused A Pressure Pulse to Occur in the Kiln System Which Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Lowered LGF Line Pressure and Adjusted Fuel Flow
6/22/2012	2:39:57	6/22/2012	2:40:42	0:00:45	269	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line which Caused LGF Flow Control Problems on Kiln 2 Which Caused A Pressure Pulse to Occur in the Kiln System Which Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Lowered LGF Line Pressure and Adjusted Fuel Flow
6/22/2012	2:48:28	6/22/2012	2:49:33	0:01:05	270	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line. The Increased Pressure Cause LGF Flow Control Problems on Kiln 2 Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Corrected Kiln 1 LGF Line Problem and Reduced Overall LGF Line Pressure
6/22/2012	2:48:29	6/22/2012	2:49:33	0:01:04	271	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line which Caused LGF Flow Control Problems on Kiln 2 Which Caused A Pressure Pulse to Occur in the Kiln System Which Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow

6/22/2012	2:55:15	6/22/2012	2:55:40	0:00:25	272	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line. The Increased Pressure Cause LGF Flow Control Problems on Kiln 2 Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Corrected Kiln 1 LGF Line Problem and Reduced Overall LGF Line Pressure
6/22/2012	2:59:03	6/22/2012	3:00:24	0:01:21	273	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line which Caused LGF Flow Control Problems on Kiln 2 Which Caused A Pressure Pulse to Occur in the Kiln System Which Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
6/22/2012	3:00:29	6/22/2012	3:10:30	0:10:01	274	Malfunction	Kiln 1 Was Having Problems Maintaining the Minimum LGF Line Pressure. The Supervisor Increased Line Pressue By Restricting the Return Line which Caused LGF Flow Control Problems on Kiln 2 Which Caused A Pressure Pulse to Occur in the Kiln System Which Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and Pump Flow
6/26/2012	17:50:11	6/26/2012	19:07:31	1:17:20	275	Malfunction	The ID Fan Tripped Which Caused a Loss of Draft In the Kiln System Which Affected the Rear Chamber System/ No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Restarted ID Fan and Established Draft in Kiln System
6/26/2012	22:29:35	6/26/2012	22:30:41	0:01:06	276	Malfunction	A Sudden Increase In Fuel Flow Caused A Pressure Pulse in the Kiln System Which Affected the Rear Chamber System/No Visiable Emission Were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow
6/26/2012	22:46:09	6/26/2012	22:46:47	0:00:38	277	Malfunction	A Sudden Increase In Fuel Flow Caused A Pressure Pulse in the Kiln System Which Affected the Rear Chamber System/No Visiable Emission Were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow
6/26/2012	23:48:05	6/26/2012	23:48:32	0:00:27	278	Malfunction	A Sudden Increase In Fuel Flow Caused A Pressure Pulse in the Kiln System Which Affected the Rear Chamber System/No Visiable Emission Were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow
6/27/2012	3:13:01	6/27/2012	3:13:26	0:00:25	279	Malfunction	A Sudden Increase In Fuel Flow Caused A Pressure Pulse in the Kiln System Which Affected the Rear Chamber System/No Visiable Emission Were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow
6/27/2012	5:05:10	6/27/2012	5:05:31	0:00:21	280	Malfunction	A Sudden Increase In Fuel Flow Caused A Pressure Pulse in the Kiln System Which Affected the Rear Chamber System/No Visiable Emission Were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow